

OSHA Regulated Chemicals (ORC)

Self- Assessment 2nd Quarter FY2002
Status of Preparation for Assessment

Robert Selvey

SHSD Industrial Hygiene Group

ESH Coordinator Meeting

02/12/02

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ORC Assessment Format

- a) Preparation (February)**
- b) Conduct Assessment- (March)**
 - 1) Program review**
 - 2) Site Inspections**
- c) Formal Report (March/April)**
- d) Implementation/Corrective Action (May)**

(a) Preparation (February)

- 1. Review regulatory drivers (SHSD).**
- 2. Develop an assessment criteria checklist (SHSD/BAO).**
- 3. Use CMS to determine applicable to BNL organizations (SHSD).**
- 4. Make contacts to set inspections schedule (SHSD).**

(b) Conducting the Assessment (March)

- 1. Written program review (SHSD and BAO)**
- 2. Conduct targeted site inspections of a representative number of facilities (SHSD and BAO)**

(c) Documentation (March)

- 1. Draft Report prepared (SHSD).**
- 2. Draft report circulated to affected parties for comments on Factual Accuracy (SHSD).**
- 3. Resolution of FA comments will be sought.**
- 4. Formal assessment document issued (SHSD).**

(d) **Close-out** (April+)

1. **Close-out meeting with BNL directorate.**
2. **BNL *Corrective Actions* to be addressed in an *Implementation Plan*.**
3. **Closure of *Corrective Actions* is tracked in ATS.**

OSHA Regulated Chemicals

- Asbestos
- 2-Acetylaminofluorene
- Acrylonitrile
- 4-Aminodiphenyl
- Benzene
- Benzidine
- 1,3-Butadiene
- Cadmium
- Chloromethylmethylether
- 3,3'-Dichlorobenzidine
- 4-Dimethyl aminoazobenzene
- Ethylene oxide
- Ethyleneimine
- Formaldehyde
- Inorganic Arsenic
- Lead
- Methylene Chloride
- Methylene Dianiline
- Methyl chloromethylether
- beta-Naphthylamine
- alpha-Naphthylamine
- N-Nitrosodimethylamine
- 4-Nitrobiphenyl
- beta-Propiolactone
- Vinyl Chloride

Site Inspections

- **Applicability of Standard-**

- OSHA 29CFR1910.1450 (Lab Standard) –vs- 29CFR1910. Subpart Z (specific chemical regulations in production uses)
- Neat chemicals -vs- trade name products
- Construction trades uses and products (29CFR1926)

- **Scope of Inspection (*Representative, random* selection of inspection areas):**

- Assessment will not inspect every **laboratory**'s use.
- Assessment will not inspect every **non-lab** (HazCom) use area, but these will receive emphasis.

Key Targets

1. **Initial Hazard Determinations-** exposure assessments that quantify exposure potential for each use. Availability of exposure monitoring records as necessary.
2. **Employee Information-** Chemical specific training records.
3. **Leak Detection-** (For Methylene chloride, need an established program for leak detection.) Potential implications for some other ORC.
4. **Medical Surveillance-** if triggered by exposure.
5. **Hygiene Area and Regulated areas-** if triggered by exposure.

Questions / Comments

1. **Are Preparation meetings desired ? Duration & audience**
2. **Other ?????**

Etiologic Agent Inventory

1. DOE Notice 450.7 seeking to verify compliance with existing CDC regulations on:
 - Notification of CDC (and now DOE) use of *Select Agents*
 - Appropriate shipping of all etiologic agents.

2. SHSD originated an *Etiologic Agent Inventory* survey. Due by 02/22/02.

IH SBMS Subject Areas

Subject Areas status:

- 1. Respiratory Protection** has been approved & posted → it is the home of the new OMC Medical Approval form & Respirator Selection form.
- 2. Asbestos-** now at SBMS for final circulation for approval- you will soon be able to view it and comment on it via the SBMS office.
- 3. Lead-** completed site wide review and was revised. Now submitted to SBMS for final SBMS formatting and approval by Steering Committee.

New IH Subject Areas to be developed in FY02

Call for development team members

1. **Biosafety in Research (N450.7)**
2. **Ergonomics**
3. **Personal Protective Equipment**
4. **Indoor Air Quality**
5. **Confined Space**